1 THE HONORABLE JAMES L. ROBART 2 3 4 5 6 UNITED STATES DISTRICT COURT 7 WESTERN DISTRICT OF WASHINGTON AT SEATTLE 8 9 ASHLEY WAHL, No. 2:20-cv-00467 JLR 10 STIPULATION AND ORDER Plaintiff, EXTENDING TIME FOR BOEING TO 11 ANSWER OR OTHERWISE RESPOND TO v. **COMPLAINT** 12 THE BOEING COMPANY; and NEWCO, NOTE ON MOTION CALENDAR: INC., d/b/a CASCADE COLUMBIA 13 APRIL 1, 2020 DISTRIBUTION COMPANY 14 Defendants. 15 16 **STIPULATION** 1. The parties, through counsel, stipulate and agree that good cause exists to extend 17 the deadline for defendant The Boeing Company to answer or otherwise respond to Plaintiffs' 18 19 Complaint. 2. On March 27, 2020, Boeing removed this case from the Superior Court of the 20 State of Washington for King County. 21 3. 22 Three other plaintiffs filed similar complaints in the Superior Court of 23 Washington, King County, all of which Boeing also removed to this Court on March 27, 2020. 24 They are: (a) Tianna Hatleberg, see Hatleberg v. The Boeing Co. et al., U.S.D.C., W.D. Wash. Case No. 2:20-cv-00464; (b) Marie Riley, see Riley v. The Boeing Co. et al., U.S.D.C., W.D. 25 26

1	Wash. Case No. 2:20-cv-00458; and (c) N.F., see Dana Ford, as guardian of N.F. v. The Boeing
2	Co. et al., U.S.D.C., W.D. Wash. Case No. 2:20-cv-00463;
3	4. The Plaintiffs in each of these four cases are represented by the same undersigned
4	plaintiffs' counsel. Boeing is represented in each of the four cases by the same undersigned
5	defense counsel. The Plaintiffs are currently evaluating whether to file motions to remand.
6	5. The parties agree that it would be in the interests of efficiency, and would
7	conserve the parties' and the Court's resources, if the parties were first to brief and resolve
8	Plaintiff's motion to remand (if any), and then turn to Boeing's answer or potential motion to
9	dismiss should the Court deny remand.
10	6. Therefore, the parties stipulate and agree that the deadline for Boeing's answer or
11	other initial response to the Complaint should be extended to twenty-one (21) days following
12	Plaintiff's counsel's written communication to counsel for Boeing of Plaintiff's decision not to
13	file a motion to remand, or, in the event that Plaintiff files a motion to remand, twenty-one (21)
14	days following the Court's order resolving Plaintiff's motion to remand.
15	DATED: April 1, 2020.
16	s/Todd R. Rosencrans, WSBA No. 26551 s/Alexandra Caggiano, WSBA No. 47862
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23	Attorneys for Defendant Attorneys for <i>Plaintiff</i> The Boeing Company
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ORDER

Based on the foregoing stipulation, it is HEREBY ORDERED that the deadline for

defendant The Boeing Company to answer or otherwise respond to the complaint is extended to

Boeing of Plaintiff's decision not to file a motion to remand, or, in the event that Plaintiff files a

motion to remand, twenty-one (21) days following the Court's order resolving Plaintiff's motion

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THE HONORABLE JAMES L. ROBART UNITED STATES DISTRICT COURT JUDGE

twenty-one (21) days following Plaintiff's counsel's written communication to counsel for

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to remand.

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DATED this 10th day of April, 2020.

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